UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION

MDL No. 2804

This document relates to:

Case No. 17-md-2804

All actions

Judge Dan Aaron Polster

MOTION FOR LEAVE TO FILE MOTION TO ESTABLISH QUALIFIED SETTLEMENT FUND, APPOINT TRUST ADMINISTRATOR, AND APPROVE PAYMENT UNDER SEAL

Pursuant to Local Rule 5.2, Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc. (collectively "Janssen") respectfully move this Court for leave to file their Motion to Establish Qualified Settlement Fund, Appoint Trust Administrator, and Approve Payment ("Motion"), along with the attached Exhibit and Proposed Order, under seal.

Local Rule 5.2 states: "No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents." Because the settlement Janssen referenced in the Motion has not been made public, the fact of the agreement is confidential under this Court's February 6, 2018 Order regarding the confidentiality of settlement discussions (ECF No. 116).

WHEREFORE, Janssen respectfully requests that the Court grant Janssen's motion for leave to file the Motion and related papers under seal.

Motion granted. /s/Dan Aaron Polster 12/24/21